

#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

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KATHLEEN TRIBBLE

Case No: C-1-03-403

Judge Arthur S. Spiegel

Plaintiff,

MOTION FOR ADMISSION

PRO HAC VICE

Vs.

(RECEIPT ATTACHED

JOHNNY LEE GRAHAM, et al

# MOTION OF PLAINTIFF KATHLEEN TRIBBLE FOR ADMISSION OF MICHAEL G. BRAUTIGAM PRO HAC VICE

Now comes plaintiff, Kathleen Tribble, and respectfully moves this Court,

Hac Vice of Attorney Michael G. Brautigam as co-counsel for plaintiff and the

pursuant to Local Rule VIII (Attorneys Specially Admitted) for admission Pro

class. Support for this Motion is provided in the attached Memorandum,

HACKETT LAW OFFICES

Paul Hackett

1014 Vine Street, Suite 1690

Cincinnati, Ohio 45202

Gene Mesh (Ohio Bar # 0002076) Michael G. Brautigam 2605 Burnet Avenue Cincinnati, Ohio 45219 (513) 221-8800 (Telephone) (513) 221-1097 (Facsimile)

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#### MEMORANDUM IN SUPPORT

This Motion is addressed to the Court to admit Attorney Michael G. Brautigam pro hac vice to the present action. Attorney Michael G. Brautigam is a member in good standing of the Bar of the States of New York, Connecticut, Florida and Kentucky. He has been admitted to practice before all courts of those states. As co-counsel for plaintiff Kathleen Tribble and will be familiar with the rules of this Court and the substantive laws of the State of Ohio.

Participation by Attorney Michael G. Brautigam is necessary for the presentation of plaintiff Kathleen Tribble's position in this case. Attorney Michael G. Brautigam is an experienced litigator and will be instrumental in representing plaintiffs and the class's interests in this action. Attached to this Memorandum in Support is the Affidavit of Michael G. Brautigam detailing his qualifications to serve as counsel in this case. In addition to his other credentials, Attorney Michael G. Brautigam is fully familiar with the facts and circumstances of the case, in that he has conducted much of the pre-filing investigation through the Ohio open records act, and has written much of the complaint. Plaintiff respectfully submits that the participation of Attorney Michael G. Brautigam will facilitate the prosecution of this action.

For the reasons set forth above, it is respectfully requested that Attorney Michael G. Brautigam be admitted pro hac vice and that he be permitted to participate as co-counsel for plaintiff Kathleen Tribble in this action.

Respectfully submitted,

**HACKETT LAW OFFICES** 

1014 Vine Street, Suite 1690 Cincinnati, Ohio 45202

Gene Mesh (Ohio Bar # 0002076) Michael G. Brautigam 2605 Burnet Avenue Cincinnati, Ohio 45219-2502 (513) 221-8800 (Telephone) (513) 221-1097 (Facsimile)

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION AT CINCINNATI

:

KATHLEEN TRIBBLE

Case No: C-1-03-403

Judge Arthur S. Spiegel

Plaintiff,

**DECLARATION OF MICHAEL** G. BRAUTIGAM IN SUPPORT

OF ADMISSION PRO HAC VICE

Vs.

JOHNNY LEE GRAHAM, et al.

### **DECLARATION OF MICHAEL G. BRAUTIGAM**

Michael G. Brautigam hereby applies to appear as counsel pro hac vice in the above case and under penalty of perjury, state the following:

1. My name, current address and phone number are:

> Michael G. Brautigam **GENE MESH & ASSOCIATES** 2605 Burnet Avenue Cincinnati, Ohio 45219-2502 (513) 221-8800

I have been admitted to practice by the highest courts of the 2. following jurisdictions on the date(s) given:

New York - 1989

Connecticut - 1989

Florida - 1992

Kentucky - 1997

Federal Courts:

United States District Courts for the Eastern and Southern District of New York - 1990

Northern District of Ohio - 1992

United States Court of Appeals for the Sixth and Seventh Circuits - 1994

United States Court of Appeals for the Third Circuit – 1998

Second Circuit 2002

United States Supreme Court 2000

- 3. I am in good standing and am currently eligible to practice in all the courts listed in paragraph 2.
- 4. I am not currently suspended or disbarred in any court.
- 5. Attached as Exhibit A is a copy of my certification of admission to practice in the Commonwealth of Kentucky and a current certificate of good standing.
- 6. By making this application, I consent to the jurisdiction of this court for any alleged misconduct occurring during the course of this matter.

Respectfully submitted this 26 day of June, 2003.

GENE MESH & ASSOCIATES

Gene Mesh (Ohio Bar # 0002076)

Michael G. Brautigam 2605 Burnet Avenue

Cincinnati, Ohio 45219-2502

(513) 221-8800 (Telephone)

(513) 221-1097 (Facsimile)

Of Counsel: **Hackett Law Offices** Paul Hackett 1014 Vine Street, Suite 1690 Cincinnati, Ohio 45202

# KEI ZUCKY BAR ASSOCIATION

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May 15, 2003

#### THIS IS TO CERTIFY THAT

# MICHAEL GEORGE BRAUTIGAM

798 Clinton Springs Avenue, Number 6 Cincinnati, Ohio 45229-1335

Membership No. 86789

is a member in good standing with the Kentucky Bar Association as required by the Rules of the Supreme Court of Kentucky, no record of any complaints or charges of any kind having been preferred against him.



BRUCE K. DAVIS REGISTRAR

Michele M. Pogrotsky, Deputy Registrat

Thu Jun 25 10:38:14 2003

UNITED STATES DISTRICT COURT

CINCINNATI, OH

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PRD HAC ON C-1-03-403

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